

Dee May  
Executive Director  
Federal Regulatory



1300 I Street N.W., Floor 400W  
Washington, DC 20005

Phone 202 515-2529  
Fax 202 336-7922  
dolores.a.may@verizon.com

March 29, 2001

**Ex Parte**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W. – Portals  
Washington, DC 20554

*RE: Application by Verizon New England Inc., et al., for Authorization To  
Provide In-Region, InterLATA Services in Massachusetts, Docket No. 01-9*

Dear Ms. Salas:

This letter responds to questions from staff concerning Verizon's unbundled interoffice ("IOF") transport performance reported in the Carrier-to-Carrier reports.

One measure of Verizon's performance for provisioning unbundled interoffice transport reported in the Carrier-to-Carrier reports – % Missed Appointments - Verizon - Total IOF (PR-4-01) – shows an apparent disparity for the months of November and December 2000. These reported measures do not provide an accurate picture of Verizon's performance.

First, during 2000, this measure compared Verizon's performance in providing unbundled interoffice transport to Verizon's performance in providing all retail special services. This comparison is inappropriate because the unbundled interoffice transport facilities Verizon provides to CLECs are predominantly at the DS-3 level, while the special services Verizon provides to retail customers are predominantly at the voice grade level. Because it is significantly more difficult to provision facilities and services at the higher DS-3 level, the Carrier-to-Carrier working group agreed to change the retail comparison for this measure. Verizon implemented this change in a compliance filing with the New York PSC on December 22, 2000. *See Verizon's Supplemental Filing, Appendix B, Tab 1A, p. 53.* Beginning January 2001, Verizon's performance in providing unbundled interoffice transport is compared to Verizon's performance in providing retail special services at the DS-3 level.

Verizon has recalculated its retail performance for the months September through December 2000 using the new business rules (DS-3 only). These results are displayed below.

		Septemb er	October	Novem ber	Decem ber
		Retail	Retail	Retail	Retail
	Total Observations (DS-3)	27	12	14	10
	Missed Appointments (DS-3)	17	3	6	4
PR-4-01	% Missed Appointments – Verizon – Total IOF	63%	25%	43%	40%

At Staff's request, Verizon has also recalculated its retail performance for both DS-3 and DS-1 service for the months September through December 2000. These results are displayed below.

		Septemb er	October	Novem ber	Decem ber
		Retail	Retail	Retail	Retail
Total Observations (DS-3 and DS-1)		386	423	385	314
Missed Appointments (DS-3 and DS-1)		86	42	31	27
% Missed Appointments		22.27%	9.9%	8.05%	8.6%

Second, the reported performance for this measure in the months of November and December includes orders that had due dates during the work stoppage, but were not completed on time. As previously explained, Verizon suspended provisioning activities during the work stoppage in August and devoted its limited resources to maintenance and repair activities. *See* Lacouture/Ruesterholz Declaration ¶¶ 309-312; Lacouture/Ruesterholz Reply Declaration ¶¶ 173-191. In November, 23 of the 33 orders for which Verizon missed the installation appointment had a due date during the work stoppage. In December, 6 of the 17 orders for which Verizon missed the installation appointment had a due date during the work stoppage. The reason these orders were

included in Verizon's November and December performance reports is because those are the months that Verizon first began billing for those network elements. In other words, Verizon's performance on an order is reported in the month that the order is completed through Verizon's billing system, which in some cases may be later than the month the order was actually provisioned.

Third, the reported performance for this measure during the two months at issue includes 8 missed orders in November and 9 missed orders in December where Verizon did not have the necessary existing interoffice facilities. Rather than rejecting these orders, Verizon went beyond its unbundling obligations and provided CLECs with due dates for these orders based on an Estimated Construction Complete Date ("ECCD") from Verizon's engineering organization. For these orders, the actual construction of additional interoffice facilities took longer than the initial estimated time frames and the estimated due dates were "missed." As in the case of loops, these orders that were missed for facilities reasons should not be counted against Verizon's on time performance. Verizon will bring this issue to the Carrier-to-Carrier working group to conform the business rules for this measure to the rules that apply to loop provisioning.

Verizon has recalculated its performance under this measure to exclude the missed orders with due dates during the work stoppage and the missed orders with estimated due dates (ECCD) requiring the construction of additional interoffice facilities. The results are displayed below and show that Verizon's performance under this measure is at parity.

		November 2000	December 2000
		CLEC	CLEC
PR-4-01	% Missed Appointments – Verizon – Total IOF	0.9%	2.5%

Please let me know if you have any questions. The twenty page limit does not apply as set forth in DA 01-106.

Sincerely,



cc E. Einhorn  
K. Farroba  
S. Pie